

Subject: Interim Policy for User Level Accounting

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To: "worldwide-lcg-management-board (LCG Management Board)"
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Dear MB,

In reaction to this thread during the last MB TelConf I attached a document with comments that I sent to Dave Kelsey in May 2006. Please note that this was not my personal view but a summary of a discussion with the data privacy commissioner of Forschungszentrum Karlsruhe.

During the April GDB 2006 Dave provided a draft of the content of a user level accounting policy and asked for feedback. I didn't cross-check Daves slides again. However, only from reading again our feedback I got the impression that several of the legal requirements for such a policy were originally contained in Daves draft but are now missing in the Interim Policy. I thus strongly encourage the JSPG to quickly review these three docs (Daves draft, the interim policy and our feedback) and proposes a new version of an interim policy that could be accepted at least for a limited period of time. In my opinion it is very important for the whole process that this interim policy is at least an official one from the JSPG.

In view of the discussions with our data privacy commissioner (documented in our attached feedback) I have real concerns about

- VOs controlling and steering the activities of individuals
- VOs setting up their own user level accounting
- VOs / groups developing their own monitoring systems down to user levels without clearly documenting the need, purpose, use and protection of the respective information. Yes, I know that the answer by VOs will be "we can't work without this", and I it is not my intention to re-initiate these discussions, especially because I am not the legal expert. But I have learnt that data privacy is to be taken really serious. Everybody dealing with private data at FZK (including IT admins) gets respective instructions and is taught that misuse is punished with fines or even custodial sentence.

Please don't misunderstand me. We (FZK) are definitely interested in general security and data privacy solutions such that grid methodologies become acceptable for everybody (including industrial partners, medical science etc.) rather than to block the whole process, and we can certainly live with properly defined interim solutions for a while (cf. second paragraph above).

Regards,
Holger